

Jonah A. Grossbardt (State Bar No.: 283584)

SRIPLAW, P.A.

1801 Century Park East

Suite 1100

Los Angeles, CA 90067

323.364.6565 – Telephone

561.404.4353 – Facsimile

jonah.grossbardt@sriplaw.com

Attorney for Plaintiff

BRYAN E. GLYNN

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

BRYAN E. GLYNN,

Plaintiff,

v.

LA LOUNGE LLC

Defendant.

Case No.: 2:18-cv-06774-VAP-SK

**MOTION FOR ENTRY OF
CLERK’S DEFAULT**

Plaintiff BRYAN E. GLYNN, by and through his undersigned counsel, hereby requests that the Clerk enter default in this matter against LA LOUNGE LLC (“LA Lounge”) hereto on the ground that LA Lounge has failed to appear or otherwise respond to the Complaint within the time prescribed by the Federal Rules of Civil Procedure. The Declaration of Jonah A. Grossbardt in Support of Motion for Entry of

1 Clerk's Default ("Grossbardt Decl.") filed concurrently herewith demonstrates that on
2 August 20, 2018, LA Lounge was served with the Summons and a copy of the
3 Complaint by personal service, by serving its registered agent, Mr. Larry Solomon,
4 2521 West Manchester Boulevard, Inglewood, California, 90305. The time allowed
5 for LA Lounge to respond to the Complaint has expired. Neither Plaintiff nor the
6 Court has granted LA Lounge an extension of time to respond to the Complaint. LA
7 Lounge has failed to answer or otherwise respond to the Complaint, or serve a copy of
8 any Answer or other response upon Plaintiff's attorney of record.

9 Plaintiff is informed and believes that LA Lounge is a corporation and is not
10 considered an infant or incompetent person. Plaintiff is informed and believes that the
11 Servicemembers Civil Relief Act does not apply.

12 WHEREFORE, Plaintiff Bryan E. Glynn requests that a default be entered by
13 the Clerk against La Lounge LLC and for such other and further relief as to the Court
14 deems just and proper in the premises.

15 DATED: September 11, 2018

/s/ Jonah A. Grossbardt

JONAH A. GROSSBARDT

SRIPLAW, P.A.

Attorneys for Plaintiff Bryan E. Glynn